

John Trupiano

March 14, 2025

UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF TEXAS

SOUTHWEST AIRLINES CO., )  
Plaintiff, )  
 )  
v. ) CIVIL ACTION NO.  
 ) 5:24-cv-01085-XR  
THE CITY OF SAN ANTONIO )  
TEXAS AND JESUS SAENZ, IN )  
HIS OFFICIAL CAPACITY AS )  
DIRECTOR OF AIRPORTS FOR )  
THE CITY )  
Defendants. )

ORAL AND VIDEOTAPED DEPOSITION OF  
JOHN TRUPIANO  
MARCH 14, 2025  
Volume 1

ORAL AND VIDEOTAPED DEPOSITION OF JOHN  
TRUPIANO, produced as a witness at the instance of  
Defendant, and duly sworn, was taken in the above-styled  
and numbered cause on the 14th day of March, 2025 from  
11:09 a.m. to 3:48 p.m., before Nancy Newhouse, a  
Certified Shorthand Reporter in and for the State of  
Texas, reported by oral shorthand, located at the law  
offices of Waddell, Serafino, Geary, Rechner, Jenevein,  
P.C., 1717 Main Street, 25th Floor, Dallas, Texas, 75201,  
pursuant to the Federal Rules of Civil Procedure and the  
provisions stated on the record or attached hereto.

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1 A P P E A R A N C E S  
2

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10 AND  
11

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18 FOR THE DEFENDANT CITY OF SAN ANTONIO TEXAS AND JESUS  
19 SAENZ:

20 Mr. Eric Pilsk  
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24 AND  
25

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1 A P P E A R A N C E S Continued  
2

3 Ms. Deborah Lynne "Debbie" Klein, via Zoom  
4 CITY OF SAN ANTONIO TEXAS  
5 203 South St. Mary's Street FL 2  
6 San Antonio, Texas 78205  
7 Telephone: (210) 207-8919

8 ALSO PRESENT:  
9 Mr. Chris Arreola, Videographer

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13	2 Request for Qualifications (RFQ): #AV1080522JR (6-pgs)	26
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15	4 Excerpts of the Ordinance dated 3/9/23 (9-pgs)	57
16	5 Programing Plan - Original 49768 - Mezzanine (2-pgs)	62
17	6 Excerpts of CORGAN's San Antonio International Airport Program Definition Manual: Advance Terminal Planning Program Volume 2 dated 3/31/23 Bate Stamped ANSER_0000001, 0000007, 00000059, 00000067, 00000071 and 00000072 (6-pgs)	66
18	7 Excerpts of CORGAN's New Terminal Programming dated 6/16/23 Bate Stamped ANSER_0001211, 0001215, 0001226, 0001227, 0001233, 0001246, 0001261 (8-pgs)	76
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## 1 PLAINTIFF'S EXHIBITS

2 NO.	3 DESCRIPTION	4 PAGE
8	Email from Mr. Trupiano to Mr. Brandenburg, Mr. Larsen cc'd Mr. O'Connor dated 7/13/23 reg: Preferential Gates Bate Stamped CONFIDENTIAL_CORGAN_025679 and 025680 (2-pgs)	91
9	Email from Mr. O'Connor to Mr. O'Krongley, cc'd Mr. Trupiano dated 5/15/23 reg: Possible Airline Placement Bate Stamped CONFIDENTIAL_CORGAN_025433 through 025437 (5-pgs)	94
10	Email from Ms. Sanchez to Mr. Brandenburg, cc'd Mr. Molloy dated 7/13/23 reg: 09222023 ESC-Presentation-Draft.pptx Bate Stamped CONFIDENTIAL_CORGAN_0002748 through 002760 (13-pgs)	100
11	CORGAN's SAT-Gating Analysis Airline Allocation Scenarios dated 10/31/23 Bate Stamped ANSER_0001564 through 0001579 (17-pgs)	110
12	Final Draft dated 9/6/24 Exhibit M, Terminal A/B Renovations (6-pgs)	119
13	Aviation Department Meeting Minutes: Executive Steering Committee dated 11/3/23 Airport Center Conference Room Bate Stamped ANSER_0001581 and 0001587 (2-pgs)	127
14	Email from Mr. Brandenburg to Mr. O'Connor, Mr. Larsen and Mr. Trupiano dated 11/8/23 reg: Gating Options Bate Stamped ACCN0031426 through ACCN0031428 (3-pgs)	135
15	CORGAN's SAT-Gating Analysis Airline Allocation Scenarios dated 12/7/23 Bate Stamped ANSER_0001653 through 0001687 (35-pgs)	139
16	Aviation Department Meeting Minutes: Executive Steering Committee dated 12/15/23 City Hall - Riverwalk Conference Room Bate Stamped ANSER_0001779 through 0001784 (6-pgs)	144

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17	Executive Steering Committee dated 12/15/23 Bate Stamped ANSER_0001731 through 0001773 (43-pgs)	145
18	CORGAN's SAT-Gating Analysis Airline Allocation Scenarios dated 1/5/24 Bate Stamped ANSER_0002486 through 00024957 (10-pgs)	152
19	Email from Mr. Blaine to Mr. Saenz Re: (External) Delta and the allocation of gates in the new concourse dated 2/6/24 (2-pgs)	154
20	Aviation Department Meeting Minutes: Executive Steering Committee dated 2/9/23 Airport Center Boeing Conference Conference Room (7-pgs)	156
21	Email from Mr. Hall to Mr. Brandenburg, Mr. Garnier, Mr. O'Krongley cc'd Ms. Sanchez, Ms. O'Krongley, Ms. Castano and Ms. Alonzo Re: Dalta HQ slide deck (DRAFT) FOR 3/4 (1-pg)	158
22	CORGAN's SAT-Gating Analysis Airline Allocation Scenarios dated 3/27/24 Bate Stamped ANSER_0003467 through 0003471 (5-pgs)	163
23	Email from Mr. Smith to Mr. Garnier, Ms. Sanchez Re: (External) FW: Blank Gate Analysis dated 5/1/24 (13-pgs)	165
24	SAT Executive Steering Committee Presentation dated 5/3/24 (22-pgs)	170
25	San Antonio Airport System Speaking Points City Council Briefings Airline Use of Lease dated 6/6/24 (4-pgs)	172
26	SAT AULA Executive Summary dated 9/16/24 (4-pgs)	178
27	SAT Summary of Decision-Making Process for Post-DBO Gate & Club Locations Bate Stamped ANSER_0003760 and 0003761 (2-pgs)	182

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## 1 PLAINTIFF'S EXHIBITS Continued

2 NO.	3 DESCRIPTION	4 PAGE
5 28	6 Email from Mr. Brandenburg to Mr. Glaser, 7 Ms. Donato, Mr. Larsen, Mr. McDonald, 8 Mr. Trupiano and Mr. O'Connor cc'd 9 Mr. Sierra, Ms. Sanchez and Mr. Molloy Re: 10 COVID Bate Stamped CONFIDENTIAL_CORGAN_022402 11 through 022407 (6-pgs)	12 183
13 29	14 Email from Mr. Trupiano to Mr. Brandenburg 15 cc'd Mr. O'Connor Re: SAT Gating Strategies 16 DRAFT dated 6/6/24 Bate Stamped 17 CONFIDENTIAL_CORGAN_029115 through 029153 18 (39-pgs)	19 190

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1 P R O C E E D I N G S

2 (On the record at 11:00 a.m.)

3 VIDEOGRAPHER: We are now on the record.

4 Today's date is March 14th, 2025, and the current time is  
5 11:00 a.m.

6 Will counsel please identify themselves  
7 for the record?

8 MR. MORALES: Lawrence Morales on behalf  
9 of Southwest Airlines.

10 MR. PILSK: Eric Pilsk for --

11 MR. GOLDBERG: And Roy Goldberg on behalf  
12 of Southwest Airlines as well.

13 MR. PILSK: Eric Pilsk on behalf of  
14 Defendants.

15 MS. SCHWARTZ: Amanda Schwartz on behalf  
16 of --

17 MS. KLEIN: Debbie Klein --

18 MS. SCHWARTZ: -- Corgan.

19 MS. KLEIN: -- on behalf of the City of --  
20 the -- the Defendants.

21 MR. PILSK: Debbie, could you say that  
22 again?

23 MS. KLEIN: Debbie Klein on behalf of the  
24 Defendants.

25 MS. SCHWARTZ: Amanda Schwartz on behalf

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1 of Corgan, the Witness.

2 VIDEOGRAPHER: And Mr. Lawrence has  
3 requested to swear in the witness.

4 Will you please swear him in?

5 MR. MORALES: Yeah. Just so we can put  
6 something on the record so it's clear later on, the court  
7 reporter is not here. She is missing a cord, and we're  
8 about 30, 45 minutes late. So by agreement of the  
9 parties, we are proceeding by videotape only and will  
10 proceed with transcribing the transcript after the fact.

11 Is there any objection to that? Do I have  
12 an agreement amongst the parties here?

13 MR. PILSK: That is our agreement, no  
14 objections.

15 MR. MORALES: Okay.

16 MS. SCHWARTZ: No objections.

17 MR. PILSK: And that was Erik Pilsk  
18 speaking for the Defendants.

19 MR. MORALES: Okay. And the also by  
20 agreement of the parties, as an officer of the Court, I  
21 think the parties agree that I will swear in Mr.  
22 Trupiano. Any problems with that?

23 MR. PILSK: This is Eric Pilsk, no  
24 problem.

25 MS. SCHWARTZ: Amanda, no problems.

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1 --

2 Q. Yeah.

3 A. -- can you simplify it?

4 Q. Sure. Did Corgan make a recommendation to the  
5 City that Delta and American should be in Terminal C?

6 A. No.

7 Q. I'm handing you what's been marked as Exhibit  
8 29.9 (Plaintiff's Exhibit No. 29 was marked for  
10 identification.)11 Q. (BY MR. MORALES) In Exhibit No. 29, are --  
12 have you seen it before?

13 A. Yes.

14 Q. Exhibit No. 29, I'll represent to you, sir,  
15 that in early May, the City notified Southwest that its  
16 gating assignment included it being assigned to Terminal  
17 A.18 That decision was not released to the  
19 other airlines until late May, and then I believe that  
20 Corgan and the City had a meeting with Southwest in June  
21 of 2024, does that sound right?

22 A. Yes.

23 Q. Okay. Is this a presentation that Corgan put  
24 together for that meeting with Southwest in -- in June of  
25 2024?